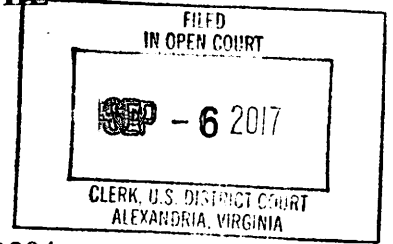


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division



UNITED STATES OF AMERICA

v.

ROSEMBERG MARTIN MAJANO,
(Counts 1-4)

JOSE ALEJANDRO ORELLANA
MONTALVO,
(Counts 1-4)

Defendants.

) Criminal No. 1:17CR204
)
) Count 1: Conspiracy to Import One
) Kilogram or More of Heroin and Five
) Hundred Grams or More of Cocaine (21
) U.S.C. §§ 963, 960(a), 952(a))
)
) Count 2: Importation of One Kilogram
) or More of Heroin
) (21 U.S.C. §§ 952(a), 960(a))
)
) Count 3: Importation of Five Hundred
) Grams or More of Cocaine
) (21 U.S.C. §§ 952(a), 960(a))
)
) Count 4: Conspiracy to Possess with
) Intent to Distribute One Kilogram or
) More of Heroin and Five Hundred
) Grams or More of Cocaine
) (21 U.S.C. §§ 846, 841(a)(1))
)
) Forfeiture Notice: 21 U.S.C. § 853

September 2017 Term – at Alexandria, Virginia

INDICTMENT

**Count 1
(Conspiracy to Import Heroin and Cocaine)**

THE GRAND JURY CHARGES THAT:

Beginning in and around August 2017, the exact date being unknown to the Grand Jury,
and continuing to on or about August 10, 2017, both dates being approximate and inclusive, at

Washington Dulles International Airport, in Loudoun County, Virginia, within the Eastern District of Virginia and elsewhere, the defendants, ROSEMBERG MARTIN MAJANO and JOSE ALEJANDRO ORELLANA MONTALVO, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree with each other, and other co-conspirators known and unknown to the Grand Jury, to unlawfully, knowingly and intentionally import into the United States, from a place outside thereof: (1) one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and (2) five hundred grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Sections 963, 960(a), 952(a).)

Count 2
(Importation of Heroin)

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 10, 2017, at Washington Dulles International Airport, in Loudoun County, Virginia, within the Eastern District of Virginia, the defendants, ROSEMBERG MARTIN MAJANO and JOSE ALEJANDRO ORELLANA MONTALVO, did unlawfully, knowingly and intentionally import into the United States, from a place outside thereof, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Sections 952(a) and 960(a).)

Count 3
(Importation of Cocaine)

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 10, 2017, at Washington Dulles International Airport, in Loudoun County, Virginia, within the Eastern District of Virginia, the defendants, ROSEMBERG MARTIN MAJANO and JOSE ALEJANDRO ORELLANA MONTALVO, did unlawfully, knowingly and intentionally import into the United States, from a place outside thereof, five hundred grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Sections 952(a) and 960(a).)

Count 4
(Conspiracy to Possess with Intent to Distribute Heroin and Cocaine)

THE GRAND JURY FURTHER CHARGES THAT:

Beginning in and around August 2017, the exact date being unknown to the Grand Jury, and continuing to on or about August 10, 2017, both dates being approximate and inclusive, in the Eastern District of Virginia and elsewhere, the defendants, ROSEMBERG MARTIN MAJANO and JOSE ALEJANDRO ORELLANA MONTALVO, unlawfully, knowingly and intentionally combined, conspired, confederated and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to unlawfully, knowingly and intentionally possess with the intent to distribute: (1) one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and (2) five hundred grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Sections 846, 841(a)(1).)

Forfeiture Notice

THE GRAND JURY HEREBY FINDS THAT:

Upon conviction of one or more of the controlled substance offenses alleged in Counts 1 through 4 of the Indictment, the defendants, ROSEMBERG MARTIN MAJANO and JOSE ALEJANDRO ORELLANA MONTALVO, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of such violation; and any of the defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation, including but not limited to \$786 seized from MAJANO upon his arrest and a white minivan, 2012 Toyota Sienna, VIN: 5TDYK3DC5CS221033 .

(Pursuant to Title 21, United States Code, Section 853 and Fed. R. Crim. P. 32.2(a).)

A TRUE BILL

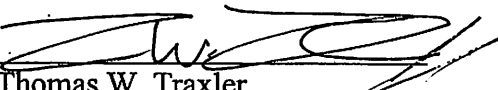
Pursuant to the E. Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

9/6/17
DATE

FOREPERSON

Dana J. Boente
United States Attorney

By:


Thomas W. Traxler
Assistant United States Attorney